

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHASOM BROWN, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

PATRICK CALHOUN, et al.,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. [20-cv-03664-LHK](#) (SVK)

20-cv-5146-LHK (SVK)

**ORDER RE DEPOSITION OF
LORRAINE TWOHILL**

Re: Dkt. No. 355 (*in 20-cv-3664*)

In the *Brown v. Google* action, the Court is in receipt of the Parties' submission regarding the deposition of Chief Marketing Officer Lorraine Twohill. Dkt. 355. Plaintiffs argue that Ms. Twohill has unique, personal knowledge of relevant issues and that less intrusive means of discovery have been exhausted; Plaintiffs' position is supported by citations to documents produced in this action. Defendant seeks to shield Ms. Twohill as an apex deponent, taking issue with Plaintiffs' interpretation of cited documents. Having carefully considered the Parties' submission, the Court **GRANTS IN PART** Plaintiffs' request under the following conditions:

- The *Brown* Plaintiffs may depose Ms. Twohill. The deposition shall not exceed 4.0 hours of testimony;
- In the event the *Calhoun* Plaintiffs intend to seek the deposition of Ms. Twohill, the date for the deposition must be coordinated such that the witness sits for deposition only once, unless the witness chooses separate dates. In the *Calhoun* action, an

independent showing under the apex standard will be required, and any time
allowed for deposition will be in addition to the time allowed in the *Brown* matter.

SO ORDERED.

Dated: December 20, 2021



SUSAN VAN KEULEN
United States Magistrate Judge